

LAZ PARKING LTD, LLC)
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)
 Petitioner,) Docket No. 12-0324
 and)
)
 COMMONWEALTH EDISON COMPANY)
)
 Respondent.)

statements. LAZ Parking understands the term “position statement” to mean a statement of a party’s position on the issues in this case. LAZ Parking’s Position Statement states its position, neither more nor less.

As Reagan said to Mondale during one of their debates in 1984, “[y]ou, know I wasn’t going to say this at all, but I can’t help it. There you go again.”³ ComEd’s Motion seeks, yet again, to re-litigate its Rule 216 judicial admissions. The cases that LAZ Parking cites in its Position Statement have all been cited before. ComEd complains, but it holds the key to its own prison cell: if ComEd ever stops re-litigating its Rule 216 judicial admissions, then LAZ Parking won’t need to cite those cases again. For ComEd to claim now that it is shocked (shocked!) that LAZ Parking would refer to them yet again is disingenuous at best.

LAZ Parking stands by its Position Statement.

Dated: June 2, 2016

Respectfully submitted,

LAZ PARKING LTD, LLC

By: /s/ ***Paul G. Neilan***

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³Available at <https://www.youtube.com/watch?v=It0Dtm1gFFQ>